

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MIDWEST GENERATION EME, LLC)	
)	
Petitioner/Counter-Respondent,)	
)	Civil Action No. 08 CV 7189
v.)	
)	Hon. Judge Robert N. Dow Jr.
CONTINUUM CHEMICAL CORPORATION)	
)	Magistrate Judge Jeffrey Cole
Respondent/Counter-Petitioner.)	
)	

**CONTINUUM’S MOTION TO RECONSIDER COURT’S DENIAL OF ITS COUNTER-
PETITION TO VACATE**

Respondent/Counter-Petitioner, Continuum Chemical Corporation (“Continuum”), by its attorneys, Gould Law Group, hereby requests that this honorable Court reconsider the denial of Continuum’s Counter-Petition to Vacate Arbitration Award (“Petition to Vacate”), and set the matter for a status at the time of presentment. In support thereof, Continuum states as follows:

1. The Court entered a Judgment denying Continuum’s Petition to Vacate and granting Petitioner Midwest Generation EME, LLC’s (“Midwest”) Petition to Confirm Arbitration Award on July 21, 2010, effectively disposing of the case.

2. Continuum’s current counsel, Gould Law Group, may have had a miscommunication and misunderstanding with Continuum regarding whether it desired to contest the Judge’s decision. Continuum may or may not choose to do so or wish to provide supporting arguments as to why the Judge’s decision should not be followed. If it does choose to do that, the undersigned will withdraw from the case. Continuum’s current counsel filed this Motion within 30 days from entry of the Judgment.

WHEREFORE, Continuum requests that this Court reconsider the denial of Continuum's Petition to Vacate entered on July 21, 2010, and set the matter for status on the date that the motion is scheduled to be heard.

Respectfully Submitted,
CONTINUUM CHEMICAL CORP.

By: /s/ Ira Gould
One of its Attorneys

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